

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**ALTA POWER LLC,**  
*Plaintiff/Counter-Defendant,*

**v.**

**GENERAL ELECTRIC INTERNATIONAL,  
INC., n/k/a GE VERNOVA  
INTERNATIONAL LLC, d/b/a GE POWER  
SERVICES,**  
*Defendant/Counter-Plaintiff.*

Case No. 3:23-CV-270-X

**GE VERNOVA INTERNATIONAL LLC'S  
MOTION TO COMPEL DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 37(a), Defendant GE Vernova International LLC (“GE”) hereby respectfully moves the Court to compel discovery and order that: (1) Alta Power, LLC’s (“Alta”) objections be overruled for Requests for Production Nos. 81–84, 87–98, 100, 104–07, 110–11, 113–27, 129–30, 136, and 142; (2) Alta apply a date range for the discovery requests that is consistent with its \$320 million lost profits claim and extend to July 2022; and (3) Alta apply the search terms GE requested. The grounds for this motion are fully set forth in the accompanying opening brief, filed concurrently.

Dated: June 14, 2024

Respectfully submitted,

/s/ Andrew LeGrand

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this filing has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand  
Andrew LeGrand

*Attorney for GE Vernova International LLC*